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UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

IN RE:

B. & J. Property Investments, Inc.,
Debtor.

Case No. 19-60138-pcm11
LEAD CASE

Jointly Administered with
Case No. 19-60230-pcm11

NOTICE OF MOTION FOR
CLASS CERTIFICATION OF
HATHAWAY CLASS ACTION

IN RE:

WILLIAM J. BERMAN,

Debtor.

CREDITORS

Plaintiffs / Class Representatives ("Class Representatives") propose to take the following action:

Class Representatives move for class certification on behalf of a proposed Class of 279 similarly situated judgment creditors listed in case number 19-60138-pcm11 at Docket 143 ("*Hathaway* Creditor Class"). Class certification is sought under Rule 7023 to allow the same 279 creditors from the *Hathaway* Class Action to proceed on a class-wide basis regarding all issues in this bankruptcy proceeding, including with regard to the *Nondischargeability Complaint* filed previously.

YOU ARE NOTIFIED that unless you file an objection to this notice no later than twenty-one (21) days after the service date, **and set forth the specific grounds for the objection** and your relation to the case, with the Clerk of the Court, 405 E 8th Ave Eugene, OR 97401 and the Debtors' attorney, Keith Karnes, 2701 12th Street SE, Salem, OR 97302, the Debtor will take the proposed action or apply for an order if required, without further notice or a hearing.

Dated January 28, 2020

/s/ Keith D. Karnes
Keith D. Karnes OSB # 033521
Attorney for Ad Hoc Group

CERTIFICATE OF SERVICE

I, Keith Karnes, certify that I served the forgoing document via ECF which will in turn serve:

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And I further served the following via first class mail, postage prepaid, addressed to:

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Dated January 28, 2020.

/s/ Keith D. Karnes
Keith D. Karnes OSB # 033521